

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CRYSTAL BRAY and SAMUEL COOK, on
behalf of themselves all others similarly
situated,

Plaintiffs,

v.

GAMESTOP CORPORATION,

Defendant.

CASE NO. 1:17-cv-01365-JEJ

**DECLARATION OF JOSEPH F.
MAHAN OF HEFFLER CLAIMS
GROUP IN SUPPORT OF PROPOSED
CLASS NOTICE**

I, Joseph F. Mahan, hereby declare:

1. I am employed as a Client Services Manager at Heffler Claims Group ("Heffler"), a company that handles the administration of class action settlements, class action notices, claims administration, and other significant services related to class action and mass tort actions.

2. Heffler Claims Group has extensive experience in class action matters, having provided services in class action settlements involving antitrust, securities, employment and labor, consumer and government enforcement matters. Heffler has provided class action services in over 1,000 settlements varying in size and complexity over the past 45 years. During the past 45 years, Heffler distributed hundreds of millions of notices and billions of dollars in settlement funds and judgment proceeds to class members and claimants.

3. Heffler is prepared to provide a full complement of notification services for the case, including email notice and mailed notice.

4. Heffler will be provided the Class Data List which will contain a combination of email and mailing addresses.

5. Email Notice: In preparation for the email notices, Heffler will work with the Parties to finalize the language for the Notice. Once the notice is approved, Heffler will provide

the notice to the email vendor for layout and preparation for the email campaign. In addition, Heffler will prepare a file to send to the email vendor that will contain records for which an email address is provided in the Class List. Once the email vendor has the notice and data, the email vendor will prepare proofs for Heffler and the Parties to review. Email proofs will be sent via email to the Parties and to representatives from Heffler to review. Upon approval of the proofs by Heffler and the Parties, the email vendor will be provided approval to begin the email campaign, and emails will be sent to class members.

6. As part of the email campaign process, the email provider notifies each of the major ISPs that Heffler is about to begin a large email campaign. This greatly reduces the risk that the ISPs will incorrectly identify Heffler-originated emails as junk mail and intercept them or otherwise divert them from recipients' inboxes. Our email service provider then reviews the proposed email subject line and body content for potential spam filter triggering words and phrases, and proves recommendations for any trouble spots. When the email campaign begins, the email vendor will track and monitor emails that are bounced. If required as part of the email campaign, the email vendor will attempt to re-send hard and/or soft bounced emails in an effort to deliver as many emails as possible. At the conclusion of the email campaign, the email vendor will be able to provide Heffler the email delivery status of each record. Heffler will report to the parties the number of records that had a successful notice delivery, and a count for the records that delivery failed. Heffler will also update its administration database with the appropriate status of the email campaign.

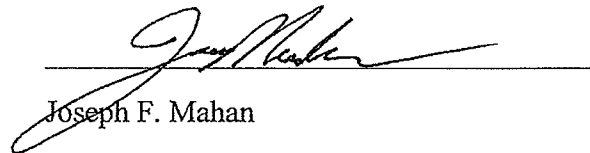
7. If the email notice was delivered successfully, no further action will be taken with respect to the record.

8. Mailed Notice: If the email was not delivered (bounced) Heffler will take the following steps to initiate a mailed notice to the Class Member. If there is a physical street address in the Class List provided to Heffler, Heffler will be mailing a notice to the address provided.

9. Mailed Notices will be sent to all physical addresses noted in Section 8 above. The approved notice language will be provided to the print/mail vendor. Heffler will also provide a

mail file to the print/mail vendor. Heffler will use the current addresses on the Class List. The print/mail vendor will prepare notice proofs for the Parties and Heffler to review and approve. The approved notices will be mailed to Class Members as directed in the Court documents.

I certify the foregoing statements are true and correct under penalty of perjury under the laws of the United States of America. Executed this 29th day of June 2018 in Philadelphia, PA.



Joseph F. Mahan